## UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA Lynchburg Division

ELLENOR ZINSKI	)
Plaintiff,	) )
v.	Civil Action No.: 6:24-cv-41-NKM
LIBERTY UNIVERSITY, INC.	
Defendant.	)

## PLAINTIFF'S MOTION TO COMPEL DISCOVERY

COMES NOW Plaintiff, pursuant to Fed. R. Civ. P. 37, and hereby moves the Court for an order compelling Defendant to produce the documents requested in discovery for the reasons stated in the accompanying memorandum of law filed herewith.

Date: March 7, 2025

Respectfully Submitted,

**ELLENOR ZINSKI** 

## /s/ Paul M. Falabella

Paul M. Falabella (VSB No. 81199) Samantha Galina (VSB No. 96981) Butler Curwood, PLC 140 Virginia Street, Suite 302 Richmond, Virginia 23219 Telephone: (804) 648-4848 Facsimile: (804) 237-0413

Email: paul@butlercurwood.com samantha@butlercurwood.com

Wyatt S.M. Rolla (VSB No. 85625) Eden Brooke Heilman (VSB No. 93554) ACLU of Virginia

Page 2 of 2

P.O. Box 26464 Richmond, Virginia 23261 Telephone: (804) 418-1980 Email: wrolla@acluva.org eheilman@acluva.org

Counsel for Plaintiff

## **CERTIFICATE OF SERVICE**

Document 44

Pageid#: 343

The undersigned hereby certifies that on March 7, 2025, the foregoing was sent to all counsel of record via the Court's electronic CM/ECF system.

/s/ Paul M. Falabella Paul M. Falabella (VSB No. 81199)